

1 WRIGHT, FINLAY & ZAK, LLP

2 Edgar C. Smith, Esq.

3 Nevada Bar No. 5506

4 Victoria L. Hightower, Esq.

5 Nevada Bar No. 10897

6 7785 W. Sahara Ave, Suite 200

7 Las Vegas, NV 89117

8 (702) 475-7978; Fax: (702) 946-1345

9 vheightower@wrightlegal.net

10 *11 Attorneys for Plaintiff, HSBC Bank USA National Association, as Trustee, in Trust for the
12 Registered Holders of ACE Securities Corp., Home Equity Loan Trust, Series 2006-FM2, Asset
13 Backed Pass-Through Certificates*

14

15 **UNITED STATES DISTRICT COURT**
DISTRICT OF NEVADA

16 HSBC BANK USA NATIONAL
17 ASSOCIATION, AS TRUSTEE, IN TRUST FOR
18 THE REGISTERED HOLDERS OF THE ACE
19 SECURITIES CORP., HOME EQUITY LOAN
20 TRUST SERIES 2006-FM2, ASSET BACKED
21 PASS-THROUGH CERTIFICATES

22 Case No: 2:16-cv-01216-KJD-NJK

23 **STIPULATION AND ORDER TO
24 EXTEND DEADLINE FOR
25 OPPOSITION TO SUZANNAH R.
26 NOONAN RIA,LLC'S MOTION TO
27 DISMISS**

28 **[FIRST REQUEST]**

15 Plaintiff,

16 vs.

17 SUZANNAH R. NOONAN IRA, LLC; SUNRISE
18 BAY OWNER'S ASSOCIATION; NEVADA
ASSOCIATION SERVICES INC.

19 Defendants.

20 Plaintiff, HSBC Bank USA National Association, as Trustee, in Trust for the Registered
21 Holders of ACE Securities Corp., Home Equity Loan Trust, Series 2006-FM2, Asset Backed
22 Pass-Through Certificates (hereinafter "HSBC" or "Plaintiff"), by and through its attorneys of
23 record, Edgar C. Smith, Esq., and Victoria L. Hightower, Esq., of the law firm of Wright Finlay
24 & Zak LLP; Defendant, and Defendant, Suzannah R. Noonan IRA, LLC (herein after "IRA"), by
25 and through its attorney of record, Michael N. Beede, Esq., of the Law Office of Mike Beede,
26 PLLC and hereby stipulate and agree as follows:
27

STIPULATION

1. IRA filed its Motion to Dismiss (“Motion”) on October 12, 2017 [EFC No. 33] with a response deadline of October 26, 2017.
2. U.S. Bank requests additional time to file a response to the Motion and the Defendant does not object to the request.
3. The request is in light of Ms. Hightower’s firm experiencing computer issues.
4. Therefore, the parties agree that U.S. Bank’s response to the Motion is now due on or before November 3, 2017.
5. The Defendant’s Reply Brief is now due on or before November 15, 2017.

DATED this 1st day of November, 2017.

DATED this 1st day of November, 2017.

WRIGHT, FINLAY & ZAK, LLP

THE LAW OFFICE OF MIKE BEEDE,
PLLC

/s/ *Victoria L. Hightower*

Edgar C. Smith, Esq.

Nevada Bar No. 5506

Victoria L. Hightower, Esq.

Nevada Bar No. 10897

Attorneys for Plaintiff, HSBC Bank USA

National Association, as Trustee, in Trust

for the Registered Holders of ACE Securities

Corp., Home Equity Loan Trust, Series 2006-

/s/ Michael N. Beede

Michael N. Beede, Esq.

Nevada Bar No. 13068

2470 St. Rose Pkwy., Ste. 201

Henderson, NV 89074

Attorneys for Suzannah R. Noonan IRA

LLC

3 **ORDER**
4

5 IT IS SO ORDERED.
6

7 Dated this 20thday of November, 2017.
8

9 nunc pro tunc
10

11 
12 U.S. DISTRICT COURT JUDGE
13

14 Respectfully submitted by:
15

16 WRIGHT, FINLAY & ZAK, LLP
17

18 /s/ Victoria L. Hightower
19 Edgar C. Smith, Esq.
20

21 Nevada Bar No. 5506
22

23 Victoria L. Hightower, Esq.
24

25 Nevada Bar No. 10897
26

27 *Attorneys for Plaintiff, HSBC Bank USA
28 National Association, as Trustee, in Trust for
the Registered Holders of ACE Securities Corp.,
Home Equity Loan Trust, Series 2006-FM2,
Asset Backed Pass-Through Certificates*